

UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

RED TREE INVESTMENTS, LLC,

Plaintiff,

-against-

PETRÓLEOS DE VENEZUELA, S.A. and
PDVSA PETRÓLEO, S.A.,

Defendants.

Docket No.: 1:19-cv-002523
(related to 1:19-cv-002519)

**NOTICE OF DEFENDANTS'
MOTION FOR ADDITIONAL
STAY**

PLEASE TAKE NOTICE that upon the accompanying Declaration of José Ignacio Hernández González in Support of Defendants' Motion for Additional Stay, and the exhibits thereto, the accompanying Memorandum of Law in Support of Defendants' Motion for Additional Stay, and all proceedings and pleadings in this action, defendants Petróleos de Venezuela, S.A. and PDVSA Petróleo, S.A., by and through their undersigned counsel, will move this Court, the United States District Court for the Southern District of New York at the courthouse thereof, located at 40 Foley Square, New York, New York 10007, before the Honorable Alison J. Nathan, for a stay of all proceedings in the above-captioned action for an additional 120 days and for such other and further relief as the Court deems just and proper.

Pursuant to the briefing schedule set by this Court on September 13, 2019 (Dkt. No. 48), Plaintiff's opposition is due on October 10, 2019, and Defendants' reply is due on October 17, 2019.

Dated: September 26, 2019

Respectfully submitted,

/s/ Dennis H. Tracey, III

Dennis H. Tracey, III

Robin L. Muir

Hogan Lovells US LLP

390 Madison Avenue

New York, New York 10017

Tel: (212) 918-3000

Fax: (212) 918-3100

dennis.tracey@hoganlovells.com

robin.muir@hoganlovells.com

Counsel for Defendants Petróleos de Venezuela, S.A. and PDVSA Petróleo, S.A